

REMARKS/ARGUMENTS

Claim Amendments

The Applicant has amended claims 1 and 15; claims 22-24 have been added. Applicant respectfully submits no new matter has been added. Support for new claims 22-24 is found in various parts of the Detailed Description including page 11 lines 4-9. Accordingly, claims 1-10, 15-18 and 22-24 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Claim Rejections – 35 U.S.C. § 103 (a)

Claims 1-3, 7-10 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bright et al (US Pat Pub 2002/0169883, hereinafter Bright) in view of Easley (US Pat Pub 2007/0093245). The Applicant respectfully traverses the rejection of these claims. The Applicant has amended claim 1 to more clearly state the limitations to which the Applicant is entitled.

The Detailed Action states that Bright teaches routing a connectivity plane to a terminal that can be reached by two or more network nodes. In one sense, the Examiner is correct in that Bright discloses routing to a terminal via more than one network node. The terminals referred to in Bright appear to be the "...base site system 121 comprised of a plurality... of base stations...". Figure 1 depicts a single base station, in a group of base stations, communicating with the MS 119.

The second limitation of claim 1 states that a network node of the first type is selected based on positional information, geographical location, of the mobile terminal the location provided by a node of the second type. As admitted in the rejection of claim 15 (paragraph 4 of the Detailed Action) Bright fails to explicitly teach indicating a geographical location of the mobile terminal and routing information. Further, the Bright reference fails to teach the selection of a particular node of the first type. The Easley reference does not disclose these limitations either.

Claim 9 further distinguishes the present application from the Bright reference. Claim 9 claims "transmission regimes" which is disclosed in the present application on

page 7, lines 28-30; "...a specific network type like ATM or TDM, via which the connectivity plane message is to be routed to the target network node of the first type." Claim 9 states that the transmission regime (type of network) is determined based on location, which is distinguished from the Bright reference. The cited portion of Bright does not disclose the limitation in claim 9, i.e.; "...determining, based on the positional information, or receiving transmission information specifying the transmission regime via which the connectivity plane message is to be routed to the determined network node of the first type." The portion of Bright cited as disclosing transmission regimes merely discloses transmitting from one type of network to another type of network (i.e., GSM to ANSI); there is no disclosure or teaching of specifying routing based on positional information.

Furthermore, the Applicant respectfully disagrees with the Examiner's analysis of the Easley reference. In the Easley reference Laura calls Scott. The information regarding Laura is described by the Examiner as positional information regarding Laura. The Applicant's positional information is related to the terminal to which the message is routed – with respect to Easley, this would be Scott's terminal, i.e., routing a connectivity plane message to a mobile terminal..." and "...indicating the geographical location of the mobile terminal...".

The Applicant respectfully submits that the amendments to clarify the claim language in claim 1 help distinguish the present application from the Bright and Easley references, whether considered individually or in combination. Claims 2-3, 7-10 and 18 depend directly or indirectly from claims 1 and 15 and recite further limitations in combination with the novel elements of claims 1 and 15. Therefore, the allowance of claims 1-3, 7-10, and 18 is respectfully requested.

Claims 4-6 and 16-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bright and Easley as applied to claim 1 above and further in view of Lin (US Pat Pub 2002/0196770). The Applicant respectfully traverses the rejection of these claims.

The Lin reference is cited for disclosing a network with split architecture. The Lin reference does not, however, disclose the limitations that are also lacking in the Bright and Easley references. This being the case, the Applicant respectfully requests the allowance of claims 4-6 and 16-17.

Claim 15 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Bright et al (US Pat Pub 2002/0169883, hereinafter Bright) in view of Ginter (US Pat 5579375). The Applicant respectfully traverses the rejection of these claims.

The Ginter reference is cited for teaching a Location Request message indicating the geographical location of the mobile terminal. The Applicant notes that the Detailed Action states that "Bright does not explicitly teach, Location Request message indicating the geographical location of the mobile terminal and routing information." The Applicant agrees with Examiner and has reviewed the portion of Bright in the Detailed Action (para. 4) and notes that a "mediation device" is used by Bright to convert a roaming number message to a location request. The mediation device is an intermediate node in the Bright reference that is not passive and is integral to call delivery in Bright.

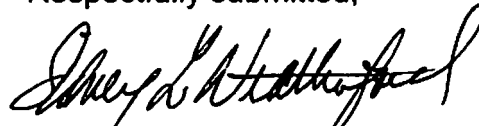
The present application and claim 15 do not disclose this node or the function provided by the node. The "network component" claimed by the Applicant discloses "...a processing component for generating positional information indicating the geographical location of the mobile terminal and routing information associated with the network component...". The processing component is a part of the network component and is not an intermediate node (mediation device) that converts messages. That being the case, the Applicant respectfully submits that Bright and Ginter, either individually or in combination, do not disclose the recited limitation and claim 15 is patentable over Bright and Ginter. The applicant respectfully requests the allowance of this claim.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sidney L. Weatherford", written in a cursive style.

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